

Comments on the MGRA DEIS Visitor Facility Improvements Project

Submitted by Roman J Motyka

February 21, 2023

Thank you for this opportunity to once again provide comments on the MGRA Master Plan. The revised SDEIS document is exhaustive and I appreciate the amount of effort that USFS staff and their consultants have put into producing it. I also appreciated the open house at the MGVC and the informational webinar.

As a board member of the Juneau Nordic Ski Club (JNSC) and chair of the JNSC's trail development subcommittee, I helped draft JNSC's comments regarding Nordic ski trail development within the MGRA. These comments, which are being submitted separately, reflect my personal views on Nordic ski trail development. I have appended them here as part of my personal commentary. My additional personal comments in this document pertain specifically to other aspects of the SDEIS.

Some personal information: I have lived in Juneau since 1984 and have hiked and/or skied just about every trail in the MGRA, many multiple times. I am a retired earth science professor specializing in glacier studies, including Mendenhall Glacier. I have given several talks at the MGVC winter fireside lecture series as well participating in seasonal naturalist trainings.

My Comments:

1. In general, I found Alternative 6 to be most attractive of all the choices presented in the SDEIS, with some exceptions.
2. As noted in the JNSC's comments (pt. 9 in Appendix) regarding the West Glacier Trail ski loops: keep both the "high" and "low" loops in all alternatives, allowing for winter-time ski grooming. This may require improvements to the current West Glacier Trail to allow for winter grooming operations.
3. Also, as noted in pt. 5 (Appendix), please reduce the number of new cabins in the Mendenhall Campground to three, deleting the southernmost cabin in the RV loop.
4. Welcome Center: I really like the concept of incorporating the center into the rock hillside below the current MGVC, as described in Alternative 6. The location allows scenic views and helps blend the center into the natural landscape. The center will also be a great asset during the offseason for local skiers, hikers, and visitors if kept open during the winter.
5. I also like the idea that the center would be potentially available for rental for hosting conferences and special events. Perhaps with the redesign of the MGVC exhibits and changes to the theater there, the traditional winter lecture series could be moved to the Welcome Center.
6. MGVC improvements: Much needed and I support adding extra space for staff offices.
7. Glacier Spur Trailheads: great to improve access to these trails.
8. Regarding the Lakeshore Trail: some folks have objected to the width and having it paved. Although I understand the objections, this is a "Recreational Area" and winter ski trails should be a vital part of the Master Plan. However, a paved trail is not needed for a Nordic

ski trail; a harden gravel trail will suffice as an alternative and a width of at least 12 feet (as noted in Alt 6) could still accommodate grooming skate and classic ski trails.

9. Nugget Falls Trail: neutral.
10. Steep Creek: yes, to restoration and yes to Alt 6 for trail expansion and building of culverts to accommodate wildlife and pedestrian traffic (pt. 1, Appendix).
11. Boat docks in general: These project components are really difficult for me to support. In general, I feel that the landscape integrity of Mendenhall Lake and the Mendenhall Glacier forelands will be heavily comprised by the addition of any and all of these docks. On the other hand, I realize that motorized boating to the glacier may become the only option for summer cruise ship visitors to experience the glacier, as, for example, happened at Portage Glacier. However, my preference is for Alt 6: no docks or boats.
12. Remote visitor center: I seriously question the need for these modules. They will be expensive to install and maintain. Seasonal removal and reinstallation will also be costly. Why not have naturalists do interpretations directly from the vessel, near the glacier rather than at a remote visitor center? Much less visitor impact! Perhaps use Portage Glacier vessel excursions as a model for a Mendenhall Glacier visitor experience?
13. Dredge Lakes trails: Alt 6 is definitely my preference as it provides for a Nordic Ski Trail loop through the middle of the Dredge Lakes unit when combined with the Lakeshore Trail (see pt. 4 in the appendix). I also agree with this alternative, that no commercial use would be allowed in the Dredge Lakes Unit.
14. Visitor capacity: I definitely favor Alt 6 for forecasting visitor capacity. The local citizenry is already deeply concerned about whether current cruise ship visitation is sustainable. I expect that a cap will eventually be enacted.
15. I also encourage shuttling of visitors from the public lot using electric vehicles.
16. It is great to see the inclusion of heat pumps and solar energy for heating and powering the proposed Welcome Center and the remote modules. And to retrofit and improve the insulation of the MGVC. I think that the USFS MGRA and MGVC should and could be on the forefront of reducing the carbon footprint of visitor centers. This should include a transition to insisting that electric buses be used to transport cruise ship and other passengers to the MGRA. The MGRA could become model for sustainable use of energy resources.

Thank you!

Roman J Motyka

Appendix A: Comments submitted by the JNSC

February 21, 2023

To: USFS, Juneau, Alaska

From: Juneau Nordic Ski Club (JNSC)

Re: Comments on the MGRA SDEIS Visitor Facility Improvements Project.

GENERAL COMMENTS

- The Juneau Nordic Ski Club (JNSC) would like to thank the USFS for this opportunity to comment on the Mendenhall Glacier Recreation Area (MGRA) Supplemental Draft Environmental Impact Statement (SDEIS), released January 5, 2023. The JNSC is a 501 c3 organization that serves the Nordic cross-country skiing community in the Juneau, Alaska area.
- The Juneau Nordic Ski Club submitted comments last spring on the US Forest Service's (USFS) original draft Environmental Impact Statement (DEIS), which presented four alternative scenarios. Alternatives 5, 6, and 7 have now been added to the new MGRA SDEIS, mainly to address seasonal issues in the visitor's center region of the MGRA and with parking along Glacier Spur Road. However, alternatives 2, 3, 5, 6 and 7 also all acknowledge the need for additional groomed Nordic skiing and walking winter trails to meet increased winter use.
- These Nordic skiing trails were proposed in our initial comments and have now been included. Addition of these trails (as discussed in the JNSC Nordic Ski Trail Development) will help realize our vision for an interconnected system of trails between the MGRA, Montana Creek, and Spaulding Meadows (MMS). We see this as a very positive step for those of us who enjoy non-motorized sports. It is heartening to have the USFS supporting and advocating for non-motorized winter sports activities in the MGRA Master Plan. Trails built to Nordic ski standards will also benefit hikers, bicyclists, and other users year-around.
- Our JSNC Youth Program has been a great success. This year, we have about 115 skiers in the program and two dozen volunteer coaches. Expanding and connecting ski trails in the MGRA would be of tremendous benefit to our youth programs. New, varied terrain will provide challenging opportunities for skill development and help alleviate trail congestion with other users during youth program practice sessions. Increasingly, community members find it difficult to share the trails when one of our youth groups is practicing. Unfortunately, times when the only trail that is available is the three-kilometer campground loop, traffic congestion is inevitable, particularly during weekends. The congestion also occurs during our evening weekday practice times and overlap with the segment of skiers out for a post-work ski. New trails would greatly alleviate congestion during these peak times.
- We understand that this document is geared towards addressing tourist capacity issues during the spring/summer/fall, but let's not forget the fourth season! We encourage the Forest Service to more fully acknowledge the heavy use the MGRA receives by locals during the winter and more prominently incorporate the need for winter ski trail improvements.
- Our response specifically addresses those sections in the SDEIS that explicitly or implicitly relate to Nordic skiing and Nordic ski trail development; we limit our comments and

suggestions to those aspects. JNSC is not taking a position on tourist expansion at the MGRA. However, we must recognize that climate change is directly impacting cross country skiing in Juneau. Therefore, the JNSC generally supports Forest Service decisions that help minimize the carbon footprint of the MGRA facilities.

- To fully maximize these new trail opportunities the JNSC suggests that USFS employ a professional Nordic ski trail architect to help with the design of the various trails that are intended for Nordic skiing and other non-motorized winter use. Additionally, we ask that the USFS also work with the JNSC regarding trail location, layout and construction that will accommodate grooming equipment (Appendix A). Capacity for multi-season, multi-sport users is important to consider up front. From decades of grooming experience, the JNSC knows that groomed winter trails develop a larger user base than just Nordic skiers.

SPECIFIC COMMENTS

1. **Steep Creek Intertie** - Make this under/overpass skiable in the winter! A connection between the Lakeshore and Dredge Lake trail system and the Powerline & Under Thunder Trails would allow for seamless skiing along the east side of the valley, through Dredge Lake, across the Mendenhall River, on up to the Montana Creek valley, and into Spaulding Meadows....without having to take your skis off!
2. **Lakeshore Trail** – This trail is included in almost all the alternatives and the JNSC fully supports making this trail wide enough to support our machines to groom for winter skiing! The route differs slightly between the versions, with 3, and 5 – 7 putting part of the trail inland. JNSC has a slight preference for the inland route. Trail width in 2 and 3 would be 14' and 12' for 5 – 7. Either width would be sufficient for grooming a skate and classic ski track.
3. **Mendenhall River Bridge** - This bridge would be a vital link in expanding our interconnected trail system and is a critical component to making the Mendenhall Valley a world-class ski destination!
4. **Dredge Lakes Loop** - Encircling the Dredge Lakes area, a 12' wide trail would enable winter grooming for skiers, bikers, and walkers alike and be located north of the popular southern dog-walking trails. This trail is only in alternative 6, but the JNSC is advocating for its full inclusion in all alternatives. The full loop with the Lakeshore Trail would be about 3.7 mi (~6 km) in length.
5. **Mendenhall Campground Cabins** - Alternatives 5-7 reduce the number of new cabins to four (from five) and include improved cabin-access trails that would encourage pedestrians to avoid our groomed trails. However, the JNSC still remains concerned about the impact the campground cabins will have on damaging groomed trails by non-skiers accessing cabins on foot. We suggest placing cabins elsewhere on the west side of the lake where there is road access and we still think the southernmost cabin is excessive and should be deleted.

6. **Warming Hut** - The JNSC suggests the proposed caretaker's cabin at the campground entrance double as a winter-time warming hut for skiers. This warming hut would serve as a nexus for divergent trail systems including the Campground – Mendenhall Lake system, the Lakeshore – Dredge Lakes trail system, the West Glacier loops, and the Montana Creek Nordic trails.
7. **Skater's Cabin Parking** - The additional parking lots in alternatives 5 - 7 are much preferred over adding parking inside the campground (alternatives 2 & 3) near the proposed Mendenhall Bridge. Expansion of these lots is much needed to accommodate winter trail use.
8. **Tolch Rock Spur Trail** - Located in the SW corner of the MGRA, this link as shown in Alternatives 2, 3, and 5-7 would connect the MGRA network of trails to the Montana Creek drainage trail system. JNSC considers expanding this spur trail to Nordic standards a high priority.
9. **West Glacier Trail Ski Loops** - The JNSC encourages the Forest Service to keep both the "high" and "low" loops in all alternatives, allowing for winter-time ski grooming (this may include improvements to the current West Glacier Trail to allow for winter grooming operations).
10. We suggest that the new "Welcome" facility be open during the winter especially on weekends, and perhaps once again serve hot cocoa and pie. It will be a great place for skiers and wintertime enthusiasts to congregate, warmup, and start their winter adventures!

SUMMARY

The JNSC, and our nearly 1000 members, are very grateful to the USFS for our mutual decades-long partnership on the MGRA. Together we have provided tens of thousands of winter user days of recreation to Juneau residents and visitors. We are eager to cooperate with the USFS in developing these new trails. The expanded trail system will accommodate the growing numbers of year-around users of the MGRA for the decades to come and is integral to establishing a connected trail system between the MGRA, the Montana Creek trails and Spaulding Meadows (MMS) (<https://jnski.org/wp-content/uploads/2022/01/JNSC-Nordic-Trail-Development-Plan-Jan-09-2022.pdf>). One outcome of such connectivity will be the opportunity to have a 50 km ski race spanning MMS! The proposed trails and infrastructure in these alternatives would enable skiers (and hikers and snowshoers and bikers and dog-walkers) to encircle the entire Mendenhall Valley, and for skiers, without kicking off their skis. All of these trails would be multi-use, non-motorized, and multi-season.

Thank you on behalf of the Juneau Nordic Ski Club.

Frankie Pillifant, President

Roman Motyka, trails subcommittee chair

APPENDIX A

For general layout and construction specifications of cross-country ski trails, and more specifically the WGL Trail, an example of guidance for cross-country ski trail construction comes from Northern Arizona University, which cites the manual, "Recreational Trail Design and Construction," developed by the Minnesota Extension Service of the University of Minnesota. It emphasizes the following aspects of recreational cross-country trail layout and construction:

1. Trail layout and length – The trail system should comprise loops with internal connectors and cutoffs that allow the skier discretion in how long to ski. Loop lengths should range from 5 to 15 km with a beginner's loop of about 1 km. Minimum clearing widths should range between 3 and 5 meters, depending on what type of skiing is accommodated and whether a steep section would require herringbone technique uphill or turns downhill. Grades should usually be less than 5% rise over run for general skiing with occasional sustained pitches of 10% and short (less-than-50-m) pitches of up to 25%.
2. Trail construction – Trails should be smooth enough and free from protrusions to accommodate grooming when snow depth reaches 0.3 m. Trails should have gentle curves, especially avoiding sharp turns at the bottom of downhill. Bridges should accommodate the width and weight of grooming and maintenance equipment.
3. Other considerations – Cross-country ski trails are considered compatible with winter snowshoeing and summer hiking and bicycling. They are considered to be incompatible with snowmobiling and wheeled traffic. Cross-country skiing venues should have adequate parking areas, rest areas for skiers, shelters every 15 to 20 km, and appropriate signage.